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May 28, 2008

Ms. Tracy Egoscue, Executive Officer
Los Angeles Regional Water Quality Control Board
320 4th Street, Suite 200
Los Angeles California, 90013

Subject: Comments regarding the proposed Municipal Separate Storm Sewer System (MS4) Permit for Ventura County.

Dear Ms. Egoscue:

It is our understanding that the Ventura Permit is likely to serve as the model for the next MS4 permit for the incorporated and unincorporated areas of Los Angeles County. Thus, the Los Angeles River Watershed does have more than a passing interest in the structure and content of the Ventura Permit. We anticipate you will be receiving numerous letters and comments from agencies and local governments and that many of these will be highly technical in nature. For the sake of brevity, this letter will not repeat the technical details, but we request you seriously consider all of these suggestions.

This letter will limit its comments to three important concerns.

1. Municipal Action Limits: As proposed, if 20 percent of samples exceed these numerical limits anytime after 3 years from the permit's effective date, permittees will not be in conformance with the MEP (maximum extent practicable) criteria. This has two important issues: First, as was pointed out by the State Board's own Blue Ribbon Panel numerical limits are not appropriate for stormwater effluent and secondly, three years is not sufficient time to conduct testing, analyze data and install BMPs that may be needed.
2. Trash: The Los Angeles River Watershed has been operating under a Trash TMDL (albeit on an on and off basis) for the past several years. Some agencies have already invested a considerable effort in complying with this TMDL through installation of full capture devices and Daily Generation Rate studies. It is requested that the blanket requirement of anti-trash inserts in all industrial and commercial catch basins not be automatically included.

3. Overly Prescriptive: The overall permit as proposed is overly prescriptive and does not allow permittees the flexibility to deal with stormwater runoff based on the unique characteristics of their individual jurisdictions.

We request that the Regional Board address these issues as well as the other important issues brought up by other agencies prior to adoption of the Ventura Permit. Thank you for the opportunity to comment and for your thoughtful consideration.

Please feel free to contact me to discuss any of the above.

Sincerely,

A handwritten signature in black ink that reads "John L. Hunter". The signature is written in a cursive style with a long horizontal flourish extending to the right.

John Hunter, Chair
Los Angeles River Watershed Management Committee.
562-802-7880 ext 25

cc: LARWMC permittees
Regional Board at 3rdddraftVCMS4@waterboards.ca.gov.